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15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN FRANCISCO DIVISION**

18
19 MAXIMILIAN KLEIN, et al., on behalf of
20 themselves and all others similarly situated,

21 Plaintiffs,

22 v.
23

META PLATFORMS, INC., a Delaware
24 Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

**DECLARATION OF DAVID Z. GRINGER
IN SUPPORT OF DEFENDANT META
PLATFORMS, INC.’S MOTION TO
EXCLUDE EXPERT TESTIMONY AND
OPINIONS OF MARKUS JAKOBSSON**

Judge: Hon. James Donato

I, DAVID Z. GRINGER, declare as follows:

1. I am a partner at the law firm Wilmer Cutler Pickering Hale and Dorr LLP. I represent Defendant Meta Platforms, Inc. in the above-captioned action. I submit this declaration in support of Meta’s Motion to Exclude the Testimony and Opinions of Markus Jakobsson.

2. Attached hereto as Exhibit 1 is a true and correct copy of the Expert Merits Report of Markus Jakobsson, Ph.D., dated January 12, 2024.

3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of the transcript from Markus Jakobsson's deposition held on February 22, 2024.

10 4. Attached hereto as Exhibit 3 is a true and correct copy of the Rebuttal Expert
11 Merits Report of Markus Jakobsson, Ph.D., dated February 9, 2024.

12 5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts of Advertiser
13 Plaintiffs' Responses and Objections to Meta Platforms, Inc.'s Fifth Set of Interrogatories to
14 Advertiser Plaintiffs, dated June 20, 2023.

15 I declare that the foregoing is true and correct under penalty of perjury.

16 || Executed on this 5th day of April, 2024, in New York, New York.

By: /s/ David Z. Gringer
David Z. Gringer

SIGNATURE ATTESTATION

This document is being filed through the Electronic Case Filing (ECF) system by attorney Sonal N. Mehta. By her signature, Ms. Mehta attests that she has obtained concurrence in the filing of this document from each of the attorneys identified on the caption page and in the above signature block.

By: /s/ Sonal N. Mehta
Sonal N. Mehta